

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA**

In re:)	Chapter 13
)	
Kenneth Joseph Woodard,)	
)	
Debtor)	Case No. 08-81442-TJM
)	
Kenneth Joseph Woodard, on behalf of himself)	
and all others similarly situated,)	
)	Adv. Pro. No. 21-08023-TLS
Plaintiffs,)	
)	
v.)	
Navient Solutions, LLC and Navient Credit)	
Finance Corporation,)	
Defendants.)	<u>CLASS ACTION</u>
)	
)	

NOTICE OF SETTLEMENT IN PRINCIPLE

Plaintiff Kenneth Joseph Woodard (“Woodard”), on behalf of himself and all others similarly situated, together with Defendants Navient Solutions, LLC and Navient Credit Finance Corporation, respectfully file this Notice to alert the Court that they have reached a settlement in principle that would encompass all claims raised between the parties in the above-captioned class action. The parties are currently working to reduce that settlement in principle to a final definitive agreement and intend to update the Court on the status of their negotiations and the anticipated procedure for consummating the final settlement at the Status Hearing set for May 1, 2023 at 1:00 PM Central Time [Dkt. Entry 61] in the above-captioned matter.

Dated: April 28, 2023

Respectfully submitted,

/s/ Jason W. Burge

Jason W. Burge
SBN (LA) 30420
Lara Richards
SBN (LA) 34054
Kaja S. Elmer
SBN (LA) 35568
FISHMAN HAYGOOD LLP
201 St. Charles Avenue, 46th Floor
New Orleans, Louisiana 70170-4600
(504) 586-5252; (504) 586-5250 fax
jburge@fishmanhaygood.com
lrichards@fishmanhaygood.com
kelmer@fishmanhaygood.com

Lynn E. Swanson (to be admitted *pro hac vice*)
Lindsay E. Reeves (to be admitted *pro hac vice*)
JONES SWANSON HUDDELL LLC
601 Poydras Street, Suite 2655
New Orleans, Louisiana 70130
(504) 523-2500; (504) 523-2508
lswanson@jonesswanson.com
lreeves@jonesswanson.com

Adam R. Shaw
George F. Carpinello (to be admitted *pro hac vice*)
BOIES SCHILLER & FLEXNER, LLP
30 S. Pearl St., 11th Floor
Albany, New York 12207
(518) 434-0600
ashaw@bsflp.com
gcarpinello@bsflp.com

Counsel for Plaintiff

/s/ Joseph A. Florczak

Joseph A. Florczak (*pro hac vice*)
McGuireWoods LLP
77 West Wacker Drive, Suite 4100
Chicago, IL 60601-1818
(312) 750-2774
jflorczak@mcguirewoods.com

and Craig A. Knickrehm #16595
Walentine O'Toole, LLP
11240 Davenport Street
Omaha, NE 68154
(402) 330-6300
cknickrehm@walentineotoole.com

Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 28th day of April, 2023, a true and correct copy of the forgoing was served via that Court's electronic case filing system (CM/ECF) to all parties registered to receive such notice in the above-captioned proceeding.

/s/ Jason W. Burge